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Attorneys for Plaintiff,
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IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

SERGEANT GARY A. STEIN, United States)	Case No.: '12CV0816 H BGS
Marine Corps, Camp Pendleton, California 92055;)	
Plaintiff,)	DECLARATION OF GARY G. KREEP IN
)	SUPPORT OF PLAINTIFF'S MOTION FOR
)	TEMPORARY RESTRAINING ORDER
v.)	
COLONEL C.S. DOWLING, Commander,)	
Weapons and Field Training Battalion, Camp)	
Pendleton, California 92055; RAY MABUS,)	
SECRETARY OF THE UNITED STATES)	
NAVY, The Pentagon, Washington, D.C.;)	
UNITED STATES DEPARTMENT OF)	
DEFENSE, The Pentagon, Washington, D.C.; and)	
UNITED STATES OF AMERICA; BRIGADIER)	
GENERAL DANIEL YOO.)	
Defendants.))	

1 I, GARY G. KREEP, hereby declare as follows:

2 1. That I am one of the civilian attorneys for SERGEANT GARY A. STEIN ("STEIN"),
3 Plaintiff herein; that I am admitted to practice before all Courts of this State, including all Federal courts
4 in this state, and that, if called upon to do so, I could, and would, competently testify as follows:

5 2. That Defendants have scheduled administrative separation proceedings against STEIN on
6 Thursday, April 5, 2012, which has the intent to result in his immediate discharge from the U.S. Marine
7 Corps and, that there is insufficient time, as a result, to prepare to defend STEIN in a case of this
8 magnitude, in such a short amount of time;

9 3. That a copy of the accompanying Application, the accompanying Memorandum of Points
10 and Authorities, supporting papers and the Complaint in this action, shall be sent to Defendants and/or
11 their legal counsel, as applicable, by e-mail and/or overnight delivery and within one business day after
12 the date of the filing of this Application.

13 I declare under penalty of perjury under the laws of the State of California that the foregoing is
14 true and correct. Executed this 2nd day of April, 2012, at Ramona, California.

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17 GARY G. KREEP
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